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No. 79-1588

In the Supreme Court of the United States

OCTOBER TERM, 1979

FEDERATION FOR AMERICAN IMMIGRATION REFORM, ET AL., APPELLANTS

v.

PHILIP M. KLUTZNICK, Secretary of Commerce, ET AL.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MOTION OF THE FEDERAL APPELLEES TO DISMISS OR AFFIRM

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Pursuant to Rule 16 of the Rules of this Court, the Solicitor General, on behalf of the federal appellees, moves that this appeal be dismissed or, in the alternative, that the judgment of the three-judge district court be affirmed.

OPINION BELOW

The opinion of the district court (J.S. App. 3a-30a) is not yet reported.

JURISDICTION

The judgment of the district court was entered on February 26, 1980 (J.S. App. 1a-2a). A notice of appeal was filed on February 27, 1980. The jurisdictional statement was filed on April 10, 1980. The jurisdiction of this Court is invoked under 28 U.S.C. 1253.

QUESTIONS PRESENTED

1. Whether this Court has jurisdiction under 28 U.S.C. 1253 over an appeal from an order of a three-judge district court dismissing an action on standing and jurisdictional grounds.

2. Whether appellants have standing to challenge the manner in which the 1980 census is conducted.

3. Whether illegal aliens residing in this country are properly included in the census.

STATEMENT

1. Article I, Section 2, Clause 3 of the Constitution, as amended by Section 2 of the Fourteenth Amendment, mandates that the members of the House of Representatives "be apportioned among the several States * * * according to their respective Numbers, which shall be determined * * * every subsequent Term of ten Years, in such Manner as [Congress] shall by law direct." Pursuant to this authority, Congress directed the Secretary of Commerce (through the Bureau of the Census) to conduct a census of the population on April 1, 1980. See 13 U.S.C. 141(a). In accordance with prior practice, the Bureau is attempting to count all persons residing in each state, without regard to the lawfulness of their presence in this country.[1] The Bureau, which must complete the census by December 31, 1980, is currently tabulating the census data. See 13 U.S.C. 141(b).

On December 5, 1979, less than four months prior to the commencement of the 1980 census, appellants filed this suit for declaratory and injunctive relief.[2] Appellants claimed that, insofar as the Bureau proposes to count illegal as well as legal aliens, the 1980 census would violate the Constitution, the Census Act, 13 U.S.C. 1 *et seq.*, and the Administrative Procedure Act, 5 U.S.C. 706(2). Appellants argued that the unlawful inclusion of illegal aliens in the census count would inflate the population of those urban areas and states that have high concentrations of illegal aliens. According to appellants, the 1980 census would thus result in the malapportionment of an unknown number of congressional seats and also state legislatures that base their apportionment on the census. In addition, appellants contended that those states and localities with relatively small populations of illegal aliens would lose an unknown amount of federal money, because numerous federal programs

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[1] More than two years prior to the commencement of the 1980 census, the Bureau informed Congress of all proposed questions and topics. See 13 U.S.C. 141(f). These submissions made clear that the Bureau intended to count every person residing in a state, including illegal aliens (J.S. App. 28a).

[2] Appellants are the Federation For American Immigration Reform, the Committee for Representative Government, and 26 federal legislators.

allocate funds according to the census figures. Appellants requested that a three-judge district court be convened to consider their claims. See 28 U.S.C. 2284 (a).

2. a. Both sides moved for summary judgment, and on February 26, 1980, a three-judge district court granted the government's motion for summary judgment, dismissed appellants' complaint, and dissolved the three-judge court. The court first concluded (J.S. App. 9a-23a) that appellants lack standing to challenge the manner in which the Bureau of Census proposed to conduct the 1980 census. The court found that, even assuming that illegal aliens should not be counted in the census, it is not possible, given the uncertainties of the general population shifts and the size and location of the illegal alien population, to ascertain which, if any, of the individual appellants would suffer a loss in representation as a result of the census (*id.* at 13a). Because none of the appellants could "allege that the weight of his or her vote in the next decade [would] *be affected* by the expected method of taking the census and apportioning congressional seats" (*ibid.*; emphasis in original), appellants failed to demonstrate a concrete injury in fact (*id.* at 13a-19a).[3]

The court held that applicants lacked standing for still another reason. Citing *Duke Power Co.* v. *Caro-*

[3] The court stated (J.S. App. 12a n.9) that appellants certainly had no standing to present a "blunderbuss attack" on Congress' decision to use the census (including illegal aliens) in allocating federal funds.

lina Environmental Study Group, Inc., 438 U.S. 59, 74 (1978), the court stated that appellants had failed to show that "the relief they seek will redress the injury they assert" (J.S. App. 20a). The court pointed out that the Bureau has no reliable method of calculating the number of illegal aliens and that one of the methods proposed by appellants, when applied to the 1970 census results, produced a total illegal alien population of *minus* 623,000 (*ibid.*). The court also noted that, in light of the complexity of the immigration laws, it was virtually impossible to define "illegal alien" for census purposes (*id.* at 20a-21a n.12). Moreover, the court recognized that because even the latest census techniques may result in the underreporting of lawful aliens and minority groups, the counting of illegal aliens might not in any event result in malapportionment (*id.* at 21a). The court concluded that (*ibid.*):

> In that event, this court will have decided a constitutional issue, ordered the expenditure of millions of dollars and caused substantial delay in the taking of the census, all with absolutely no effect on the [appellants'] voting rights. Our jurisdiction may not rest on so ephemeral a possibility of relief.

Furthermore, the court suggested that this suit did not present a ripe case or controversy (J.S. App. 22a-23a). It observed that even after the census was complete, it would be difficult to ascertain whether the inclusion of illegal aliens had adversely affected

any particular individual's voting representation. Nonetheless, the court stated that "[a]t that time, it might be possible to show that there is a substantial likelihood that a particular state, and thus a particular plaintiff, has suffered the requisite 'concrete injury' required by article III, in that the procedures used have resulted in the loss of one or more congressional seats" (*id.* at 23a).

b. The court also indicated (J.S. App. 24a-28a) that even if they had standing, appellants would not be entitled to equitable relief. The court concluded that the public interest in permitting the census to go forward substantially outweighed appellants' eleventh hour claim of irreparable harm. In addition, the court observed that "[appellants'] case appears to be very weak on the merits" (*id.* at 25a). The court explained that the all-inclusive language [4] and the history of the Constitution show that illegal aliens are to be counted in the census. In particular, the court relied on the fact that the Congress that proposed the Fourteenth Amendment and subsequent Congresses have assumed that the census includes all aliens (*id.* at 25a-26a). The court also noted that for two hundred years the Bureau has attempted to count every resident, including illegal aliens and numerous other groups (such as women, convicts, and the insane), who at one time or another have been

[4] Section 2 of the Fourteenth Amendment, which supplanted in part the apportionment provision of Article I, provides that the census shall include "the whole number of persons in each State."

disfranchised or otherwise legally disabled (*id.* at 25a).

c. Finally, the court decided that there was no basis for convening a three-judge district court and that appellants' claim should have been considered by a single district judge. The court explained that 28 U.S.C. 2284(a) requires a three-judge district court only "when an action is filed challenging the constitutionality of the apportionment of congressional districts or the apportionment of any statewide legislative body." Looking to the language and legislative history of the statute, the court found that an action challenging census practices is not an apportionment case within the meaning of 28 U.S.C. 2284(a). See J.S. App. 28a-29a.[5] Accordingly, the court ordered the three-judge court dissolved.

ARGUMENT

1. This case does not fall within the Court's appellate jurisdiction under 28 U.S.C. 1253. The three-judge district court did not decide the merits of appellants' challenge to the census. Rather, it ruled that appellants lack standing to contest the manner in which the census is taken and also that such a challenge is not a case involving the "constitutional-

[5] In order to expedite the litigation and out of an abundance of caution, Judge Gasch specifically certified that he agreed with the conclusions of the three-judge court. See *Swift & Co.* v. *Wickham*, 382 U.S. 111, 114 n.4 (1965). Subsequently, on February 29, 1980, Judge Gasch denied appellants' request for an injunction pending appeal, and on March 17, 1980, this Court also denied appellants' application for a stay of the census pending appeal (No. A-747).

ity of the apportionment of congressional districts" within the meaning of the three-judge court statute. See 28 U.S.C. 2284(a). In our view, the court's analysis of these issues is correct. But even if the court erred both as to appellants' standing and as to the propriety of convening a three-judge court, it is well settled that "a direct appeal will lie to this Court under § 1253 from the order of a three-judge federal court denying interlocutory or permanent injunctive relief only where such order rests upon resolution of the merits of the constitutional claim presented below." *MTM, Inc.* v. *Baxley*, 420 U.S. 799, 804 (1975). Accordingly, where, as here, the three-judge court merely decides questions of standing and jurisdiction, appeal lies only to the court of appeals. See, *e.g.*, *MTM, Inc.* v. *Baxley, supra* (abstention); *Gonzalez* v. *Automatic Employees Credit Union*, 419 U.S. 90 (1974) (standing); *Mengelkoch* v. *Industrial Welfare Comm'n*, 393 U.S. 83 (1968) (jurisdiction); *Wilson* v. *City of Port Lavaca*, 391 U.S. 352 (1968) (jurisdiction).

Furthermore, appellants must now seek review in the court of appeals instead of this Court because the three-judge court determined that appellants' case was properly heard by a single judge and therefore dissolved itself (J.S. App. 2a, 28a-29a). As this Court explained in *Wilson* v. *City of Port Lavaca, supra*, "[t]he resulting situation is similar * * * to that which results when a single judge declines to convene a three-judge court and denies relief: an appeal lies to the appropriate United States Court

of Appeals, and not to this Court." 391 U.S. at 352. Thus, even assuming that the three-judge court incorrectly dissolved itself,[6] this Court lacks jurisdiction to consider appellants' claims at this time. Accord, *Mengelkoch* v. *Industrial Welfare Comm'n, supra;* R. Stern & E. Gressman, *Supreme Court Practice* § 2.14(5)(d), at 109-110 (5th ed. 1978).

Appellants nonetheless argue (J.S. 17-18) that this case is distinguishable from the authorities discussed above "by reason of the fact that the three judges below considered not only FAIR's standing but also the merits of the Constitutional claims." This argument is both factually and legally without merit. First, in *Mengelkoch* v. *Industrial Welfare Comm'n, supra*, the lower court concluded that the plaintiffs' constitutional claims were insubstantial

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[6] The court below correctly concluded that appellants' suit does not fall within the purview of 28 U.S.C. 2284(a). That statute authorizes the convening of a three-judge court only "when an action is filed challenging the constitutionality of the apportionment of congressional districts or the apportionment of any statewide legislative body." 28 U.S.C. 2284(a). Here, appellants do not challenge any actual "apportionment." Rather, they contest certain census practices that might ultimately affect the allocation of congressional seats among and within the states and that might be used by state legislatures to apportion various legislative districts. Such an indirect and premature attack on future apportionment does not satisfy the narrow terms of Section 2284(a). See S. Rep. No. 94-204, 94th Cong., 1st Sess. 12 (1975); S. Rep. No. 93-206, 93d Cong., 1st Sess. 13 (1973) ("Subsection (a) would also continue the requirement for a three-judge court in cases challenging the constitutionality of *any statute apportioning* congressional districts or apportioning any statewide legislative body") (emphasis supplied).

and it therefore dissolved the three-judge court. See 284 F. Supp. 950, 953-956 (C.D. Cal. 1968). Even though the three-judge court had thus considered the merits of the plaintiffs' constitutional argument, this Court unanimously reaffirmed that "when, as here, a three-judge court dissolves itself for want of jurisdiction, an appeal lies to the appropriate Court of Appeals and not to this Court." 393 U.S. at 83-84. Moreover, although here the lower court did indicate that appellants' claim appeared to be without merit, its order in no sense "rests upon resolution of the merits of [appellants'] constitutional claim * * *." *MTM, Inc.* v. *Baxley, supra,* 420 U.S. at 804.

Appellants further suggest (J.S. 18-19) that this Court should reconsider its prior decisions concerning direct appeals from three-judge district courts, because those cases were decided before Congress amended the three-judge court statutes in 1976. See Pub. L. No. 94-381, 90 Stat. 1119. At that time, however, Congress merely repealed many of the provisions that required the convening of three-judge courts; Congress purposefully did not amend 28 U.S.C. 1253, the jurisdictional provision at issue here. See S. Rep. No. 94-204, 94th Cong., 1st Sess. 3, 4-5, 7, 10-12 (1975); S. Rep. No. 93-206, 93d Cong., 1st Sess. 4-5, 6-7, 10-11 (1973). Indeed, the Senate Report accompanying the original bill expressly recognized that " '[i]f a three-judge court is convened, but it determines that three judges were not necessary, appeal is to the court of appeals.' " S. Rep. No. 93-206, *supra,* at 6 (quoting Prof.

Charles Wright with approval). And the legislative history as a whole evidences a clear congressional purpose to alleviate the burden of direct appeals on this Court, and not, as appellants contend, to liberalize the requirements of direct appeals in a limited class of cases. See S. Rep. No. 94-204, *supra,* at 3, 4-5; H. R. Rep. No. 94-1379, 94th Cong., 2d Sess. 4 (1976); S. Rep. No. 93-206, *supra,* at 3 (quoting remarks of the Chief Justice).

This appeal should therefore be dismissed for lack of jurisdiction. Because appellants have also filed a protective notice of appeal to the court of appeals (J.S. 13 n.4), there is no need to vacate the judgment below to allow the district court to enter a fresh decree. Compare *Wilson* v. *City of Port Lavaca, supra.*

2. If the Court disagrees with our jurisdictional submission, then the judgment of the district court should be affirmed because, as we demonstrate below, appellants' claims are plainly insubstantial.

a. As the district court concluded (J.S. App. 11a-23a), this dispute does not present an Article III case or controversy. In light of the myriad of factors affecting the census, including population shifts and the underreporting of minorities and lawful aliens, it is far from evident that a reapportionment based on a census including illegal aliens would deprive appellants of any voting rights, even if it is assumed that illegal aliens should not be counted in the census. In other words, the inclusion of illegal aliens in the census count might well be cancelled out by the sub-

stantial underinclusion of minorities and lawful aliens residing in the same area. See *id.* at 21a. Moreover, it is certainly true that, until the census is taken, it is impossible to ascertain whether any particular appellant will be deprived of voting representation. Because "*none* of the [appellants] are able to allege that the weight of his or her vote in the next decade *will be affected* by the expected method of taking the census" (*id.* at 13a; emphasis in original), none of the appellants has shown the requisite "injury in fact" necessary to establish standing at this time. See *Warth* v. *Seldin*, 422 U.S. 490, 501-508 (1975); *O'Shea* v. *Littleton*, 414 U.S. 488, 493-499 (1974); *Daughtrey* v. *Carter*, 584 F.2d 1050, 1056-1057 (D.C. Cir. 1978) (no standing to challenge voting by illegal aliens); *Sharrow* v. *Brown*, 447 F.2d 94 (2d Cir. 1971), cert. denied, 405 U.S. 968 (1972) (no standing to challenge census); *Lampkin* v. *Connor*, 239 F. Supp. 757, 760-763 (D.D.C. 1965) (no standing to challenge census), aff'd on other grounds, 360 F.2d 505 (D.C. Cir. 1966).[7]

[7] In addition, the court below recognized that appellants lack standing because there is no " 'substantial likelihood' that the relief requested will redress the injury claimed * * *." *Duke Power Co.* v. *Carolina Environmental Study Group, Inc.*, 438 U.S. 59, 75 n.20 (1978). See also *Arlington Heights* v. *Metropolitan Housing Dev. Corp.*, 429 U.S. 252, 262 (1977); *Simon* v. *Eastern Kentucky Welfare Rights Organization*, 425 U.S. 26, 38 (1976); *Warth* v. *Seldin*, *supra*, 422 U.S. at 504. There is often no simple method to determine an alien's legal status without a full hearing (cf. 8 U.S.C. 1251), and there is little possibility that a census question requesting that illegal aliens identify themselves as such would be accurately answered. Finally, appellants' proposed statistical analysis of the raw data to be collected is highly imprecise. Indeed, application of their method to the 1970 census produced the absurd conclusion that there were minus 623,000 illegal aliens in the country. See J.S. App. 20a.

b. Appellants' claim (J.S. 19-25) regarding the inclusion of illegal aliens in the census does not warrant plenary review by this Court. Article I, Section 2, Clause 3 of the Constitution broadly provides that the census includes the "whole Number of free Persons" in each state, except for untaxed Indians and slaves.[8] As the court below pointed out (J.S. App. 25a), the fact that the Framers specifically excepted two groups from the scope of the Census Clause strongly supports the conclusion that all other persons, including aliens, fall within the inclusive language of the provision. To be sure, there were no illegal aliens at the time the Constitution was written. But the Constitution itself authorized Congress to enact laws concerning immigration and naturalization (Art. I, Sec. 8, Cl. 4), and the constitutional debates make clear that Congress was to be apportioned "by the number of the State's *inhabitants*." *Wesberry* v. *Sanders*, 376 U.S. 1, 13 (1964) (emphasis supplied). See *The Federalist* No. 54, at 369 (J. Cooke ed. 1961).

[8] Slaves were to be counted as three-fifths of a person. Of course, that portion of Article I was repealed by Section 2 of the Fourteenth Amendment.

Moreover, the history and language of the Fourteenth Amendment squarely refute appellants' contentions. This Court has repeatedly concluded that an illegal alien is a "person" within the ambit of Section 1 of the Fourteenth Amendment (see, *e.g.*, *Mathews* v. *Diaz*, 426 U.S. 67, 77 (1976); *Wong Wing* v. *United States*, 163 U.S. 228, 238 (1896); *Yick Wo* v. *Hopkins*, 118 U.S. 356, 369 (1886)), and appellants suggest no reason why an illegal alien should be considered a "person" for purposes of Section 1 of the Fourteenth Amendment but not for Section 2. To the contrary, the congressional debates show that Congress purposefully adopted the inclusive phrase "whole number of persons in each State" while specifically rejecting more restrictive alternatives such as "citizens" or "voters." See Cong. Globe, 39th Cong., 1st Sess. 9-10, 141, 359, 535, 2804 (1866); J.S. App. 25a-26a. For example, Representative Conkling observed that the exclusion of aliens from the apportionment base would "cause considerable inequalities * * *, because the number of aliens in some States is very large." Cong. Globe, 39th Cong., 1st Sess. 359 (1866).

Finally, for two hundred years, the Bureau of the Census and its predecessors have consistently counted all residents in the United States, regardless of whether they are mental incompetents, convicts, illegal aliens, or otherwise legally disabled persons. See J.S. App. 25a. Congress has repeatedly approved this settled administrative practice, particularly with regard to persons "in this country in violation of

law." 86 Cong. Rec. 4372 (1940) (colloquy between Reps. Rankin and Celler). See, *e.g.*, 71 Cong. Rec. 1821-1822 (1929) (remarks of Sen. Vandenberg); *Hearings on H.J. Res. 20, 101, 356, and 484 Before the House Comm. on the Judiciary*, 71st Cong., 3d Sess. (Serial 16) 27 (1931); 86 Cong. Rec. 4371-4372 (1940). In fact, Congress held extensive hearings regarding the 1980 census and was fully aware that the Bureau intended to count all persons, including illegal aliens. See, *e.g.*, *Economic and Social Statistics for Spanish-Speaking Americans: Hearings on H.J. Res. 406 Before the Subcomm. on Census and Statistics of the House Comm. on Post Office and Civil Service*, 93d Cong., 2d Sess. 23-25, 33, 35, 82-83 (1974); *The Census Undercount Problem: Hearing Before the Subcomm. on Commerce, Consumer, and Monetary Affairs of the House Comm. on Government Operations*, 96th Cong., 1st Sess. 19, 23-25, 29-31 (1979).

CONCLUSION

The appeal should be dismissed for lack of jurisdiction. If the Court concludes that the appeal is proper under 28 U.S.C. 1253, the judgment of the district court should be affirmed.

Respectfully submitted.

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